

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH BENTLEY,

Defendant.

Criminal Action No. 06- 106

REDACTED

INDICTMENT

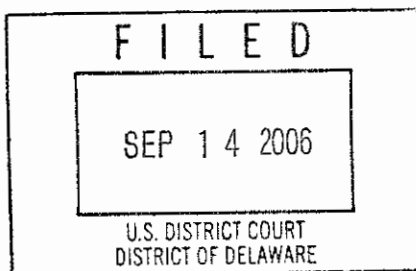
The Grand Jury for the District of Delaware charges that:

Count I

From in or about December 2005, and continuing up to in or about May 2006, in the State and District of Delaware, Joseph Bentley, defendant herein, did knowingly conspire and agree with individuals known and unknown to the grand jury to commit the following offense against the United States: to knowingly distribute heroin and fentanyl, controlled substances, and the distribution of these controlled substances resulted in the death and serious bodily injury to another individual as a result of the use of these controlled substances, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), all in violation of 21 U.S.C. § 846.

Count II

From in or about December 2005, and continuing up to in or about May 2006, in the State and District of Delaware, Joseph Bentley, defendant herein, did knowingly conspire and agree with individuals known and unknown to the grand jury to commit the following offense against the



United States: to knowingly distribute heroin and fentanyl, controlled substances, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), all in violation of 21 U.S.C. § 846.

Count III

On or about April 28, 2006, in the State and District of Delaware, Joseph Bentley, defendant herein, did knowingly distribute heroin and fentanyl, controlled substances, and the distribution of these controlled substances resulted in the death and serious bodily injury to another individual as a result of the use of these controlled substances, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

Count IV

On or about April 28, 2006, in the State and District of Delaware, Joseph Bentley, defendant herein, did knowingly distribute heroin and fentanyl, controlled substances, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

Count V

On or about May 5, 2006, in the District of Delaware, Joseph Bentley, defendant herein, did knowingly possess with the intent to distribute heroin, fentanyl, cocaine, and cocaine base, controlled substances, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

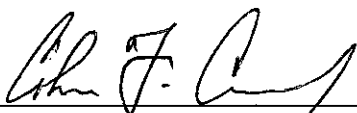
Count VI

On or about May 5, 2006, in the State and District of Delaware, Joseph Bentley, defendant herein, during and in relation to a drug trafficking crime for which the person may be prosecuted in a court of the United States, to wit, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), as alleged in Count V of the Indictment, incorporated by reference herein, did, in furtherance of such crime, knowingly carry

a firearm, to wit, a .22 caliber Heritage pistol, in violation of Title 18, United States Code, Section 924(c)(1)(A).

A TRUE BILL:

Foreperson



COLM F. CONNOLLY
United States Attorney

Dated: September 14, 2006